

1 NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP  
2 STEPHEN N. ROBERTS (SBN 062538)  
3 KATRINA J. LEE (SBN 191142)  
4 SOPHIE N. FROELICH (SBN 213194)  
5 50 California Street, 34th Floor  
6 San Francisco, California 94111-4799  
7 Telephone: (415) 398-3600  
8 Facsimile: (415) 398-2438  
9 gliddencase@nossaman.com

10 Attorneys for Plaintiffs  
11 JODY GLIDDEN, MICHAEL LEBLANC  
12 AND TRISH GLIDDEN

13 DANIEL J. BERGESON (SBN 105439)  
14 CAROLINE MCINTYRE (SBN 159005)  
15 KRISTEN H. LEE (SBN 225574)  
BERGESON, LLP  
16 303 Almaden Blvd., Suite. 500  
17 San Jose, CA 95110-2712  
18 Telephone: (408) 291-6200  
19 Facsimile: (408) 297-6000  
Email: cmcintyre@be-law.com  
Email: dbergeson@be-law.com  
Email: klee@be-law.com

20 Attorneys for Defendants  
21 SKILLSOFT PLC, DAVID C. DRUMMOND, AND  
22 GREGORY M. PRIEST

23  
24  
25  
26  
27  
28 UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

29 JODY GLIDDEN, MICHAEL LEBLANC AND ) Case No: C-04-4913-CRB  
30 TRISH GLIDDEN, )  
31 Plaintiffs, ) STIPULATION AND [PROPOSED] ORDER  
32 vs. ) INFORMING COURT OF TERMINATION  
33 SKILLSOFT PLC (FKA SMARTFORCE PLC); ) OF MEDIATION AND SETTING BRIEFING  
34 SLATE ACQUISITION CORP.; DAVID C. ) SCHEDULE  
35 DRUMMOND; GREGORY M. PRIEST; )  
36 PATRICK E. MURPHY; AND JACK HAYES, )  
37 Defendants. )  
38 \_\_\_\_\_)

1 On May 17, 2005, pursuant to a stipulation among the parties, the Court ordered ("May 17  
2 Order") that defendants need not file their response to the Amended Complaint, pending a mediation.  
3 Pursuant to the Order, if there was no settlement, any motion to dismiss was to be filed within 14 days of  
4 the termination of the mediation, and pursuant to an agreed briefing schedule. Further, the parties were  
5 ordered to inform the Court of the results of the mediation.

6 This stipulation hereby informs the Court that the mediation was held on Monday, July 18, 2005,  
7 but terminated that day without the parties settling. Subsequently, on August 11, 2005, defendants  
8 replaced their counsel, Wilson Sonsini Goodrich & Rosati LLP, with Bergeson LLP.

9 The parties agree to the following proposed briefing schedule for any motion to dismiss/motion  
10 to strike:

11 August 22, 2005 Motion to Dismiss  
12 September 9, 2005 Opposition brief  
13 September 16, 2005 Reply brief  
14 October 14  
September 30, 2005 Hearing Date

15 The parties respectfully request that the Court order the briefing schedule set forth above.

16 IT IS SO STIPULATED.

17 Dated: August 12, 2005 NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP  
STEPHEN N. ROBERTS

18 / S /  
19 By: \_\_\_\_\_ STEPHEN N. ROBERTS

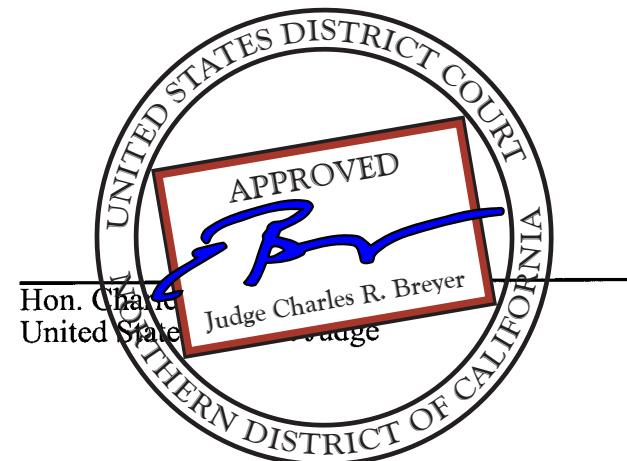
20 Attorneys for Plaintiffs  
21 JODY GLIDDEN, MICHAEL LEBLANC  
AND TRISH GLIDDEN

22 Dated: August 12, 2005 BERGESON, LLP  
23 DANIEL J. BERGESON  
CAROLINE McINTYRE

24 / S /  
25 By: \_\_\_\_\_ CAROLINE McINTYRE  
26 Attorneys for Defendants  
SKILLSOFT PLC, DAVID C. DRUMMOND, AND  
GREGORY M. PRIEST

1 **ATTESTATION** I, Stephen N. Roberts, am the ECF User whose identification and password are being  
2 used to file this document. In compliance with General Order 45.X.B, I hereby attest that Caroline  
3 McIntyre has concurred in this filing.

4 /S/  
5 Stephen N. Roberts



6  
7 IT IS SO ORDERED.  
8

9 Dated: August 15, 2005  
10

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28